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Attorney for: Santander Consumer USA Inc. dba Chrysler Capital as
servicer for CCAP Auto Lease Ltd.

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEW JERSEY

In re:)	
)	Case No. 15-20885(JKS)
BRIGETTE MILLER-LEVY)	
)	Chapter 13
)	
)	Hearing date: 8-27-15
)	
)	
)	OBJECTION TO CONFIRMATION
)	
)	

Santander Consumer USA Inc. dba Chrysler Capital as servicer for
CCAP Auto Lease Ltd., the lessor of a motor vehicle to the
debtor, objects to the debtor's plan for the following reasons:

- a. The debtor must assume the lease and pay all lease payments
directly to Santander Consumer USA Inc. dba Chrysler Capital
as servicer for CCAP Auto Lease Ltd. in accordance with the
terms of the lease and must either immediately purchase the
vehicle or surrender it at lease end, and the plan must so
provide.
- b. The vehicle must be insured with comprehensive and collision
insurance coverage and liability coverage in accordance with
the requirements contained in the lease. Prepetition lease
arrears must be treated as an administrative priority expense
and paid to Santander Consumer USA Inc. dba Chrysler Capital

as servicer for CCAP Auto Lease Ltd. concurrently with or prior to payment of counsel fees, and in all events, prepetition arrears must be paid with interest and within 6 months of filing, OR before the lease terminates, whichever occurs first.

c. Presently the plan is silent, and as a result, **REJECTS THE LEASE**. If the lease is not assumed, the automatic stay and co-debtor stay will terminate at the conclusion of the confirmation hearing in accordance with 11 U.S.C. 365(p)(3).

/s/ John R. Morton, Jr.
John R. Morton, Jr., attorney
for Santander Consumer USA Inc.
dba Chrysler Capital as servicer
for CCAP Auto Lease Ltd.

Dated: 7-13-15